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July 26, 2021

Via ECF

**MEMO ENDORSED**

Honorable Kimba M. Wood  
United States District Judge  
500 Pearl Street  
New York, NY 10007-1312

RE: USA v. Jerimias Jimenez Cruz  
19-cr-326 (KMW)

Dear Judge Wood,

Your Honor appointed me as substitute counsel for Mr. Jimenez Cruz on July 12, 2021 and scheduled a video status conference for Friday, July 30, 2021 at 11:00 a.m. I am respectfully requesting that the status conference be carried for 60 days.

I have spoken about this case with Adam Hobson, AUSA and my client's previous counsel, however, I have not yet been able to see my client since I was out of the area all of last week. The discovery in this case is quite voluminous, however, I have not yet been able to view it because the flash drive provided by previous counsel does not work.

If I am afforded 60 days to review discovery and consult with my client, I believe I will be in a much better position to advise Your Honor how this case will proceed. AUSA Hobson consents to this request for adjournment.

I thank Your Honor for considering this request.

Respectfully yours,

/s/ *Thomas Ambrosio*  
Thomas Ambrosio

cc: All counsel via ECF

**The conference scheduled for July 30, 2021 is adjourned to September 29, 2021 at 11:00am.**

**Because counsel needs additional time to review discovery and consult with Defendant, the Court finds that an exclusion of time is in the interests of justice, and that such interests outweigh the interests of the public and Defendant in a speedy trial. Time is thus excluded through September 29, 2021.**

**SO ORDERED.**  
**Dated: July 26, 2021**  
**New York, NY**

*/s/ Kimba M. Wood*

**The Honorable Kimba M. Wood**  
**United States District Judge**